NORLITE CORPORATION

628 SO. SARATOGA STREET
PO BOX 684
COHOES, NY 12047
PHONE: (518) 235-0401
FAX: (518) 235-0233

May 22, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report
Kiln 1: 05/01/12 – 05/21/12
Kiln 2: 05/01/12 – 05/21/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 05/01/12 thru 05/21/12. The attached document explains each of the "malfunctions" for Kilns One & Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. Norlite conducted maintenance on Kiln 2, on May 15, 2012; to address several issues included stack gas cutoffs. When the kiln maintenance was complete, the water on the Mist Pad was left on which caused excess water in the system and thus caused water droplets to affect the stack gas probes. The Mist Pad water was turned off which resolved the stack gas cutoff issues.

Norlite is still pursuing the new technology for stack gas flow measurement and are hopefully it will resolve the problems seen with the current stack gas probes. Norlite and its consultant will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

DCL: 2410

Norlite Corporation

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments
ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4 w/attachments

DCL: 2410

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
05/01/12 - 05/21/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
5/4/2012	20:53:18	5/4/2012	20:53:48	0:00:30	83	Malfunction	High LGF Line Pressure Caused Reduced Pump Flow Control Which Caused the Upper Instantaneous Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Reduced LGF Line Pressure and Adjusted Pump Flow
5/8/2012	8:39:56	5/8/2012	8:41:17	0:01:21	84	Malfunction	High LGF Line Pressure Caused Reduced Pump Flow Control Which Caused the Upper Instantaneous Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Reduced LGF Line Pressure and Adjusted Pump Flow
5/13/2012	5:03:05	5/13/2012	5:03:37	0:00:32	85	Malfunction	A Sudden Increase In LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse In the Kilns System Which Effected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/16/2012	5:04:40	5/16/2012	5:05:51	0:01:11	86	Malfunction	High LGF Line Pressure Caused Reduced Pump Flow Control Which Caused the Upper Instantaneous Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Reduced LGF Line Pressure and Adjusted Pump Flow

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
05/01/12 - 05/21/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
5/4/2012	14:36:15	5/4/2012	14:37:40	0:01:25	219	Malfunction	The Kiln Pump Was Out of Service So Valving was Used to Control LGF Line Pressure and LGF Flow, a Pressure Spike was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
5/4/2012	19:30:09	5/4/2012	19:31:09	0:01:00	220	Malfunction	The Kiln Pump Was Out of Service So Valving was Used to Control LGF Line Pressure and LGF Flow, a Pressure Spike was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
5/6/2012	1:24:03	5/6/2012	1:28:52	0:04:49	221	Malfunction	The Kiln Pump Was Out of Service So Valving was Used to Control LGF Line Pressure and LGF Flow, a Pressure Spike was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	LGF Flow	Span	Adjusted LGF Line Pressure and Fuel Flow
5/6/2012	4:29:47	5/6/2012	4:32:46	0:02:59	222	Malfunction	The Kiln Pump Was Out of Service So Valving was Used to Control LGF Line Pressure and LGF Flow, a Pressure Spike was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	LGF Flow	Span	Adjusted LGF Line Pressure and Fuel Flow
5/6/2012	22:53:22	5/6/2012	22:54:06	0:00:44	223	Malfunction	The Kiln Pump Was Out of Service So Valving was Used to Control LGF Line Pressure and LGF Flow, a Pressure Spike was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	LGF Flow	Span	Adjusted LGF Line Pressure and Fuel Flow
5/9/2012	13:10:39	5/9/2012	13:13:47	0:03:08	224	Malfunction	The Kiln Pump Was Out of Service So Valving was Used to Control LGF Line Pressure and LGF Flow, a Pressure Spike was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	LGF Flow	Span	Adjusted LGF Line Pressure and Fuel Flow
5/9/2012	13:14:07	5/9/2012	13:14:54	0:00:47	225	Malfunction	The Kiln Pump Was Out of Service So Valving was Used to Control LGF Line Pressure and LGF Flow, a Pressure Spike was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
5/10/2012	3:10:01	5/10/2012	3:10:42	0:00:41	226	Malfunction	The Kiln Pump Was Out of Service So Valving was Used to Control LGF Line Pressure and LGF Flow, a Pressure Spike was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns

5/10/2012	3:11:05	5/10/2012	3:12:09	0:01:04	227	Malfunction	A Sudden Increase In LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse In the Kilns System Which Effected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/14/2012	0:39:55	5/14/2012	0:40:30	0:00:35	228	Malfunction	A Sudden Increase In LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse In the Kilns System Which Effected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/14/2012	0:53:08	5/14/2012	0:53:45	0:00:37	229	Malfunction	A Sudden Increase In LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse In the Kilns System Which Effected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/14/2012	0:53:49	5/14/2012	0:54:39	0:00:50	230	Malfunction	A Sudden Increase In LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse In the Kilns System Which Effected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/14/2012	1:01:43	5/14/2012	1:02:37	0:00:54	231	Malfunction	A Sudden Increase In LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse In the Kilns System Which Effected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/14/2012	15:21:33	5/14/2012	16:24:54	1:03:21	232	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span/Filter Baskets Plugged/High CO's	LGF Flow	Span	Cleaned Filter Baskets/Adjust Fuel Flow
5/15/2012	1:17:04	5/15/2012	1:31:05	0:14:01	233	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span/LGF Pump Stopped	LGF Flow	Span	Restarted LGF Pump
5/15/2012	2:01:21	5/15/2012	2:01:52	0:00:31	234	Malfunction	A Sudden Increase In LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse In the Kilns System Which Effected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/15/2012	2:01:21	5/15/2012	2:01:52	0:00:31	235	Malfunction	A Sudden Increase In LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse In the Kilns System Which Effected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/15/2012	15:47:26	5/15/2012	16:08:25	0:20:59	236	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / I & E Cleaned Probe	Stack Gas Flow Rate	Span	I & E Cleaned Probe
5/19/2012	23:08:34	5/19/2012	23:12:56	0:04:22	237	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water

5/19/2012	23:28:53	5/20/2012	0:18:54	0:50:00	238	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / I & E Cleaned Probe	Stack Gas Flow Rate	Span	I & E Cleaned Probe
5/20/2012	1:01:37	5/20/2012	1:06:45	0:05:08	239	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/20/2012	1:11:55	5/20/2012	1:31:16	0:19:21	240	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/20/2012	3:03:53	5/20/2012	3:28:02	0:24:09	241	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/20/2012	3:34:52	5/20/2012	4:07:17	0:32:25	242	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/20/2012	6:35:59	5/20/2012	6:36:21	0:00:22	243	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/20/2012	9:08:42	5/20/2012	9:26:13	0:17:31	244	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/21/2012	0:23:32	5/21/2012	0:23:56	0:00:24	245	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/21/2012	0:42:59	5/21/2012	0:45:07	0:02:08	246	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/21/2012	1:37:30	5/21/2012	1:44:24	0:06:54	247	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/21/2012	1:57:36	5/21/2012	1:58:00	0:00:24	248	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/21/2012	3:21:48	5/21/2012	3:22:41	0:00:53	249	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/21/2012	4:16:24	5/21/2012	4:16:45	0:00:21	250	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water

5/21/2012	4:51:41	5/21/2012	4:52:36	0:00:55	251	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/21/2012	5:07:00	5/21/2012	5:07:25	0:00:25	252	Malfunction	Mist Pad Water Flow Was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water